

# EXHIBIT 12

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI

JOSHUA GLASSCOCK, individually )  
and on behalf of all others )  
similarly situated, )  
Plaintiff, )  
v. ) Case No.  
SIG SAUER INC, ) 6:22-cv-3095-MDH  
Defendant. )

VIDEO DEPOSITION OF JOSH GLASSCOCK, VOLUME II  
produced, sworn, and examined on the part of the  
Defendant in an action pending in the United States  
District Court, Western District of Missouri, in the  
above-captioned matter, scheduled to begin at 9:30  
AM on Thursday, March 6, 2025, at the Hotel  
Vandivort, 305 East Walnut Street, Springfield,  
Missouri, before KAREN VEST, Registered Professional  
Reporter, Certified Realtime Reporter, and Certified  
Court Reporter within and for the State of Missouri.

ALPHA REPORTING & VIDEO  
1911 South National, Suite 405  
Springfield, Missouri 65804  
417.887.4110

1 submitted to the court, our part of the case.

2 Q. Do you recall how many documents there  
3 were?

4 A. All I can say is several.

5 Q. So I know you were previously deposed  
6 in about -- almost two years ago now in May of 2023.  
7 Does that sound right?

8 A. Yes.

9 Q. Have you acquired any other firearms  
10 since that time?

11 A. I now own a Glock 19 that was issued to  
12 me by the sheriff's office.

13 Q. And does that mean that the sheriff's  
14 office purchased the Glock 19?

15 A. Yes.

16 Q. Okay. And is the Glock 19 the firearm  
17 that the sheriff's office uses for all of its  
18 employees?

19 A. Yes.

20 Q. And was the Glock 19 in a new condition  
21 when you got it?

22 A. No.

23 Q. Meaning it had been used by another  
24 officer prior to?

25 A. It had been used. I don't know if it

1 was another officer, but it's been used.

2 Q. And apologies; you may have already  
3 said. But when did you, um, obtain the Glock 19?

4 A. It would have been November of '24.

5 Q. And does your Glock 19 have a manual  
6 safety?

7 A. It has a trigger safety.

8 Q. Does that mean it does not have a  
9 manual safety?

10 MR. WERTS: Object to form. Go ahead.

11 THE WITNESS:

12 A. No.

13 MS. GULLIVER:

14 Q. What does -- what are you referring to  
15 when you mean a trigger safety?

16 A. On the trigger there's a safety that  
17 has to be pressed before the gun will go off.

18 Q. Mm-hmm. Do you know whether your Glock  
19 has the Glock performance trigger?

20 A. Say that again.

21 Q. Sure. Do you know whether the Glock 19  
22 that you have has been fitted with the Glock  
23 performance trigger that came out in 2023?

24 A. I don't know.

25 Q. Have you had to fire your Glock 19?

1 A. I've shot the Glock 19 a lot.

2 Q. So does that mean that you think that  
3 you're more accurate because you've had more  
4 experience with the Glock 19?

5 A. Practice makes you better.

6 Q. Just stepping back and thinking about  
7 what you consider when you're -- you personally are  
8 purchasing a firearm, what do you generally look for  
9 when you purchase a firearm?

10 A. Um, I look for reliability. I usually  
11 look at other opinions on the weapons.

12 Q. When you say other opinions, what are  
13 you referring to?

14 A. Um, just other reputable sources that  
15 have used the weapon and have endorsed the weapon.

16 Q. And what sort of sources do you  
17 consider to be reputable?

18 A. Law enforcement. Military. Reputable  
19 gun enthusiasts.

20 Q. And when you say a reputable gun  
21 enthusiast, do you have someone in particular in  
22 mind?

23 A. No.

24 Q. Can you recall any reputable gun  
25 enthusiasts you have considered in the past when you

1 have been considering purchasing a firearm?

2 A. No.

3 Q. Are there particular characteristics of  
4 a firearm beyond its reliability that you look for?

5 A. I haven't purchased many guns, but I do  
6 look for its performance and not --

7 Q. Mm-hmm. I just want to switch, um, to  
8 your Taurus pistol that I think you mentioned in  
9 your prior deposition.

10 Do you still own that one?

11 A. Yes.

12 Q. Okay. Do you still use it as your  
13 carry firearm?

14 A. You need to define carry firearm.

15 Q. Well, let's -- let's go with -- strike  
16 that.

17 Um, what do you use it for, if  
18 anything?

19 A. Um, sometimes I can still carry it.

20 Q. On the way to work?

21 A. No.

22 Q. And do you know what model Taurus you  
23 have?

24 A. Don't know the exact model, but it is a  
25 .380 caliber.

1 Q. If I mentioned a Taurus PT738, does  
2 that sound familiar to you?

3 A. No.

4 Q. Do you recall how you purchased your  
5 Taurus pistol?

6 A. Yes.

7 Q. And how is that?

8 A. I bought it from a gun store.

9 Q. And was it in new condition when you  
10 purchased it?

11 A. Yes.

12 Q. Do you recall the name of the store  
13 that you purchased it from?

14 A. No.

15 Q. And did you receive the owner's manual  
16 with your Taurus when you purchased it?

17 A. Yes.

18 Q. Have you ever read that owner's manual?

19 A. No.

20 Q. Have you, um, shot your Taurus --

21 A. Yes.

22 Q. -- pistol? About how many times?

23 A. I would go with hundreds again.

24 Q. What do you like about shooting your  
25 Taurus pistol?

1 MR. WERTS: Sure. Thank you.

2 MS. GULLIVER: So let's just confirm.

3 And you said page --

4 MR. WERTS: 72 is where it begins.

5 MS. GULLIVER: Okay. Thank you.

6 MR. ROWINSKI: Okay. We are gonna mark

7 Exhibit 3 as --

8 MS. GULLIVER: Um, it's a document

9 Bates stamped SIG-MARKETING-000042.

10 MR. WERTS: Thank you.

11 MS. GULLIVER: One for you.

12 MR. DAMERON: I don't need it. It's  
13 okay.

14 MS. GULLIVER: You don't?

15 MR. DAMERON: Yeah. I mean if you have  
16 extras, sure.

17 MR. ROWINSKI: Yeah, I have five of  
18 everything.

19 MR. DAMERON: Oh, that's great. Thank  
20 you so much. Thanks. Thank you.

21 MR. MANN: Yep.

22 (Whereupon, Exhibit 3, Marketing  
23 Materials for SIG Sauer P320;  
24 SIG-MARKETING-000042; 1 page, was  
25 introduced on behalf of Ms.



1 Gulliver for purposes of this  
2 proceeding.)

3 MS. GULLIVER:

4 Q. I just want to ask, have you ever seen  
5 this document before?

6 A. What?

7 Q. The document in front of you. Have you  
8 ever seen that before?

9 A. I don't recall this specifically. But  
10 I've seen the SIG emblem before and I've seen a  
11 picture of a P320 before.

12 Q. Just to be clear, though, you don't  
13 believe you've seen this specific document with all  
14 of its content before?

15 A. I -- I can't recall.

16 Q. When you say you've seen a picture of a  
17 P320 before, um, when are you referring to?

18 A. The question is so vague, I -- I've  
19 seen pictures of SIGs whenever I was looking at  
20 information about the SIG. I've seen -- I've seen  
21 pictures of SIGs before, SIG P320s.

22 Q. So --

23 A. I can't tell you a specific time of how  
24 many -- of when and how many times I've seen a  
25 picture of a SIG P320.

1 Q. It sounds like it was many times. Is  
2 that an accurate description?

3 A. Over the course of many years, yes.

4 Q. Okay. You can put that aside for now.

5 MR. WERTS: That keeps them in the  
6 right order.

7 (Whereupon, Exhibit 4, Marketing  
8 Materials for SIG Sauer P320;  
9 SIG-MARKETING-000253; 1 page, was  
10 introduced on behalf of Ms.  
11 Gulliver for purposes of this  
12 proceeding.)

13 MS. GULLIVER:

14 Q. Now I'm going to show you what's been  
15 marked as Exhibit 4.

16 MR. WERTS: That's yours. Thank you.

17 MS. GULLIVER:

18 Q. And for the record, this document has  
19 been Bates stamped SIG-MARKETING-000253. I'm going  
20 to ask you a similar question.

21 Do you recall ever seeing this document  
22 before?

23 A. I don't recall.

24 Q. Okay. You're making this easy for me.  
25 Crossing off questions. That's probably gonna make

1 you happy.

2 Um, so let's --

3 A. Are we done with this one?

4 Q. For now. You can just put it to the  
5 side.

6 (Whereupon, Exhibit 5, Marketing  
7 Materials for SIG Sauer P320;  
8 SIG-MARKETING-000034-037; 5 pages,  
9 was introduced on behalf of Ms.  
10 Gulliver for purposes of this  
11 proceeding.)

12 MS. GULLIVER:

13 Q. Now I'm going to show you what's been  
14 marked as Exhibit 5.

15 MR. WERTS: Thank you.

16 MS. GULLIVER:

17 Q. And for the record, this has been Bates  
18 stamped SIG-MARKETING-000033 to 37. And I'm going  
19 to ask you a similar question.

20 Have you ever seen this document  
21 before, for these images?

22 A. I don't remember anything specific like  
23 this. Let me look at the rest of this.

24 Q. Of course.

25 A. I don't remember this specifically, but

1 I do remember seeing something to the effect of the  
2 US military had adopted the weapon and seen pictures  
3 of military personnel with the SIG P320.

4 But this particular document, I don't  
5 recall specifically.

6 Q. And I believe in your prior deposition  
7 you testified that you had read some sort of media  
8 article that talked about that.

9 Is that what you might be referring to,  
10 or is it something else?

11 A. I did read an article also, but I have  
12 seen pictures of military-dressed people with the  
13 P320 as if they also liked the P320.

14 Q. Mm-hmm. And -- and that recollection  
15 that you have, do you recall about when that was?

16 A. Whenever I was researching the P320.

17 Q. So you mean before purchase, correct?

18 A. Yes, and I've seen it since.

19 Q. So if I could just direct you to the  
20 top of the first page, it says Carbon Media/TFB  
21 Forums.

22 Do you see that?

23 A. Yes.

24 Q. Have you ever heard of Carbon Media?

25 A. No.

1 A. Not -- I don't know. No.

2 Q. And then if you go to the bottom of the  
3 page before the last image, it says The Wire.

4 Are you familiar with The Wire?

5 A. No.

6 Q. Okay. So you can put that aside for  
7 now.

8 (Whereupon, Exhibit 6, Marketing  
9 Materials for SIG Sauer P320;  
10 SIG-MARKETING-000051; 1 page, was  
11 introduced on behalf of Ms.  
12 Gulliver for purposes of this  
13 proceeding.)

14 MS. GULLIVER:

15 Q. Now I'm going to show you what has been  
16 marked as Exhibit 6.

17 MR. WERTS: Thank you.

18 MS. GULLIVER: Uh-huh.

19 Q. And for the record, this has been  
20 marked as SIG-MARKETING-000051.

21 I bet you can guess my question, which  
22 is, have you seen this document before?

23 A. Not this specific document.

24 But again, that guy looks like he's in  
25 the military or some sort of SWAT fatigues holding a

1 P320. So I do remember seeing that. Not that  
2 specific picture, but things like it.

3 Q. Have you ever heard of Recoil magazine?

4 A. Can you say that name again?

5 Q. Recoil magazine?

6 A. No.

7 Q. Okay. You can put that aside for the  
8 time being.

9 (Whereupon, Exhibit 7, Marketing  
10 Materials for SIG Sauer P320;  
11 SIG-MARKETING-000088; 1 page, was  
12 introduced on behalf of Ms.  
13 Gulliver for purposes of this  
14 proceeding.)

15 MS. GULLIVER:

16 Q. I'm now gonna show you what's been  
17 marked as Exhibit 7.

18 MR. MANN: Thank you.

19 MR. WERTS: Thank you.

20 MS. GULLIVER:

21 Q. And it has been marked as  
22 SIG-MARKETING-000088.

23 Have you ever seen this document  
24 before?

25 A. I have not seen this specific that I

1 recall.

2                   However, that also looks like military  
3 fatigues with a military helicopter in the  
4 background holding a P320.

5                   Q. And do you see at the top in big  
6 capitalized letters it says M17 The Chosen One?

7                   A. I see that it says that.

8                   Q. And when you referenced seeing pictures  
9 of the, um, individuals holding the P320, do you  
10 recall ever seeing language like M17 in reference to  
11 it?

12                  A. No. I just remember seeing P320.

13                  Q. You can put that aside.

14                         So what information did you want SIG  
15 Sauer to have told you before you purchased your  
16 P320?

17                         MR. WERTS: Object to form. Calls for  
18 a legal conclusion. Go ahead.

19                         THE WITNESS: What did you say?

20                         MR. WERTS: I just made some  
21 objections.

22                         THE WITNESS: Oh, okay.

23                         MR. WERTS: But go ahead and answer.

24                         THE WITNESS:

25                         A. Okay. I wish they would have told me

1 all of the features of the gun that I now know.

2 I wish they would have told me that it  
3 has a light trigger pull, that when there's a round  
4 in the chamber it is fully energized, and that it  
5 does not have an external safety. That would have  
6 been nice to know.

7 MS. GULLIVER:

8 Q. Just addressing part of your answer,  
9 you said that you wanted to know that it did not  
10 have an external safety.

11 You did know that though, right?

12 MR. WERTS: And I'm -- I hate to keep  
13 interjecting.

14 But the knowledge of the external  
15 safety or lack thereof was covered extensively in  
16 the first deposition, page 42, 43, 73. And so I  
17 think that's already been discussed.

18 MS. GULLIVER: Correct. But he's the  
19 one who referenced it in response to this question,  
20 not me.

21 So are you saying that I can't explore  
22 the fact that he previously said he did know he  
23 had -- it didn't have an external safety and now  
24 he's saying he wanted to have been told that? Is  
25 that the position you're taking?



1 pull.

2 What do you mean by that?

3 A. It's not as hard to pull the trigger as  
4 other guns.

5 Q. Do you know whether other firearms have  
6 a similarly light trigger pull?

7 A. I don't know specific firearms that are  
8 that way.

9 Q. And if you knew that the P320 had a  
10 light trigger pull, how would that have affected  
11 your purchase decision, if at all?

12 A. If I had known all the three things  
13 that I already told you, I wouldn't have bought the  
14 gun.

15 Q. Mm-hmm. So have you -- when you're  
16 purchasing firearms, have you ever researched the,  
17 um, trigger on a firearm?

18 A. Just like some previous answers, I've  
19 assumed the gun manufacturers make them safely  
20 within some parameters.

21 Q. Mm-hmm.

22 A. So I have not researched specifically  
23 triggers, the details of the triggers of the guns  
24 I've bought.

25 Q. Okay. Um, but I believe you've

1 understood after shooting them that they do have  
2 different trigger experiences, whether it be easier  
3 to pull or harder to pull. Is that correct?

4 MR. WERTS: Object to form. Go ahead.

5 THE WITNESS:

6 A. Of course once I feel it, I can feel  
7 that some of them feel different.

8 MS. GULLIVER:

9 Q. Mm-hmm. So I think you mentioned that  
10 your Taurus had a heavier trigger pull.

11 Does that sound accurate to you?

12 A. It feels heavier.

13 Q. Mm-hmm. And in terms of the Glock 23,  
14 what was your experience of that trigger pull?

15 A. Felt heavy.

16 Q. Did it feel the same as the Taurus?

17 A. Again, we're talking about my muscle  
18 memory of shooting a weapon that I don't remember  
19 the last time that I shot it.

20 And the Glock that you're referring to,  
21 I don't even own anymore.

22 Q. I'm not really sure what you're trying  
23 to say or how that answers my question.

24 A. I don't -- I don't -- can't  
25 specifically remember how they felt. I know that

1 they were heavy.

2 Q. Okay. So that's a perfectly fine  
3 answer. Just -- I understand that a lot of this has  
4 happened a long time ago --

5 A. Yeah.

6 Q. -- so you know.

7 A. I'm trying to answer the best I can.

8 Q. Appreciate that. Thank you.

9 So when you've done research to  
10 purchase firearms, you have not specifically  
11 researched trigger pull weight. Is that correct?

12 A. That's correct.

13 Q. Have you ever had a conversation with  
14 any of your friends about how a trigger feels when  
15 it's pulled?

16 A. Yes.

17 Q. Can you tell me about those  
18 conversations?

19 A. Again, when we're talking about  
20 specifics and time, I know that you already  
21 understand that.

22 But yes, I -- I talk about guns with my  
23 friends and I know that there's lighter trigger  
24 pulls. There's different things that you can do on  
25 even rifles to make the trigger easier to pull.

1 it the way they want it made for its most productive  
2 form. Its best features is the way that they've  
3 made it. So I haven't --

4 Q. Are you aware that say particular  
5 models of a firearm might have a trigger pull weight  
6 that varies depending on which version of that  
7 firearm you purchase?

8 MR. WERTS: Object to form. Go ahead.

9 THE WITNESS:

10 A. I'm sure that that's possible.

11 MS. GULLIVER:

12 Q. But it hasn't mattered to you to figure  
13 out the trigger pull weight for any particular  
14 firearm before you purchased it?

15 A. I haven't researched trigger pull  
16 weight on any of the pistols I've bought.

17 (Whereupon, Exhibit 8, Marketing  
18 Materials for SIG Sauer P320;  
19 SIG-MARKETING-000213-214; 2 pages,  
20 was introduced on behalf of Ms.  
21 Gulliver for purposes of this  
22 proceeding.)

23 MS. GULLIVER:

24 Q. I'm going to show you what's been  
25 marked as Exhibit 8.

1 MR. WERTS: Thank you.

2 MS. GULLIVER:

3 Q. And for the record, it has been marked  
4 as SIG-MARKETING-000213 to 214.

5 And ask you, have you ever seen this  
6 document before?

7 A. Again, not specifically. But I've seen  
8 a picture of a P320 before.

9 Q. And do you see on the upper -- almost  
10 upper left-hand corner it says P320 Full-Size?

11 A. Yes.

12 Q. And is that the same model that you  
13 have of a P320?

14 A. It looks like it.

15 Q. Okay. So -- and apologies, because the  
16 way some of these were printed makes some of the  
17 text very tiny, so I'm sorry for that.

18 But if we refer you to the back of the  
19 page there on the second page, um, I just want to --  
20 maybe two-thirds of the way down the last line, do  
21 you see it says Trigger Pull?

22 A. Yes.

23 Q. And do you see it says 6.5 pounds?

24 A. Yes.

25 Q. Um, so SIG Sauer did disclose the

1 trigger pull weight for its P320 models, correct?

2 MR. WERTS: Object to form. Vague as  
3 to date. Go ahead.

4 THE WITNESS:

5 A. I haven't seen this document before.  
6 But wherever -- I guess.

7 MS. GULLIVER:

8 Q. Um, and then, you know, just I want to  
9 point you to the I guess almost bottom right of it  
10 right below the trigger pull weight it says -- it  
11 has a date on it, looks like 09.08.17.

12 Do you see that?

13 A. Yes.

14 Q. And so it looks like this was a  
15 document created in 2017 disclosing the trigger pull  
16 weight for your model P320?

17 MR. WERTS: Object to form. Go ahead.

18 THE WITNESS:

19 A. I haven't seen this document.

20 MS. GULLIVER:

21 Q. Okay. Again, that's not the question  
22 I'm asking.

23 I'm asking whether this document which  
24 is dated from 2017 discloses the trigger pull weight  
25 for your model P320?

1 different, what do you mean?

2 A. I wouldn't have bought the gun.

3 Q. Have you ever researched the trigger  
4 pull length of any firearm that you were considering  
5 purchasing?

6 A. No.

7 Q. So similarly, did you ever ask anyone  
8 prior to purchase of your other pistols what the  
9 trigger pull length was?

10 A. No.

11 Q. And in the conversations you've had  
12 with other people, have you ever had discussions  
13 about the trigger pull length of a firearm?

14 A. We're referring to the distance it  
15 takes from the trigger to --

16 Q. Mm-hmm.

17 A. -- fire?

18 Q. Yes.

19 A. Yes.

20 Q. And what do you recall, if anything, of  
21 those discussions?

22 A. Recently on my Glock there is -- we  
23 call it take-up, which is the distance you take that  
24 pulls that tension out of the gun. And then breathe  
25 through and pull the trigger.

1 eyesight check.

2 And in looking at Exhibit 6, if you  
3 look at the picture of the P320, do you see right  
4 below it, it says, "Adaptable, modular, safe."

5 And then right below that you'll see,  
6 "The same crisp trigger group easily converts into  
7 over 40 configurations of caliber, color, and size  
8 to suit any shooter's every need."

9 Do you see that?

10 A. I see that. Yeah, I see the verbiage.

11 Q. Do you have an understanding of what  
12 someone means when they say crisp trigger?

13 A. I can speculate what that might mean,  
14 yeah.

15 Q. Okay. And what -- what would that mean  
16 to you?

17 A. That it would be a quicker. When I  
18 think of crisp, I think of an apple, crisp bite. So  
19 I assume quick.

20 Q. Thank you. Going to your Glock 19 that  
21 you now use, um, how would you describe the trigger  
22 pull of your Glock 19?

23 A. Long. Stiff. It's all about the  
24 take-up of it --

25 Q. Mm-hmm.



1           A. -- is how I would describe it.  
2 Takes -- it takes energy from me and thought to pull  
3 the trigger.

4           Q. Is the trigger on your Glock 19 curved?

5           A. Say -- curved?

6           Q. Mm-hmm.

7           A. Yes.

8           Q. Okay. And I know you gave this answer  
9 a bit ago, so if I don't have it correct, please do  
10 correct me.

11                   But I believe you testified earlier one  
12 of the things you wanted to be told by SIG was that  
13 the P320 had something along the lines of sufficient  
14 energy to discharge a bullet anytime a round is  
15 chambered.

16                   Does that sound right?

17           A. I would have liked to have been told  
18 that the gun was fully energized, that it had a  
19 light trigger pull, and it did not have an external  
20 safety.

21                   I would have liked to have been told  
22 all three of those things in one setting as an  
23 advertisement for the gun.

24           Q. Okay. And just -- just to focus on the  
25 fully energized piece for the moment.

1 Q. Sure. Let's -- so just to make sure  
2 I'm following.

3 Are you saying that you read an article  
4 about a case involving the P320 where that article  
5 disclosed that the three factors you mentioned --  
6 that it was fully energized, that it was, you know,  
7 a short, crisp trigger, and that it lacked an  
8 external safety -- was the reason?

9 Is that -- am I understanding you  
10 correctly?

11 A. That's not what I'm saying.

12 Q. Okay.

13 A. I'm saying that I've seen news articles  
14 about police officers having a P320 and it going off  
15 in their holster. That's all I'm saying.

16 Q. Okay. So then I'm not exactly sure how  
17 that addresses my question.

18 But, um, so what I'm trying to  
19 understand is how you are aware that the only  
20 firearm in your mind that has all three of these  
21 characteristics is the P320.

22 Am I correct in understanding that that  
23 is something you obtained from your attorneys?

24 A. Yes, that's how I've gained my  
25 knowledge.

1 Q. Okay. In looking at, um, firearms  
2 advertisements, have you ever seen a manufacturer  
3 advertise that their -- um, the firearm at issue is  
4 fully energized?

5 A. Not that I can recall.

6 Q. Anything at all about, you know, the  
7 energy of a given firearm?

8 A. Not that I can recall.

9 Q. Have you ever inquired about how much  
10 energy a particular firearm you're purchasing, um,  
11 has?

12 A. Not that I can recall.

13 Q. Have you ever asked anyone prior to  
14 purchasing a firearm how many steps it would take,  
15 um, before the trigger would go off?

16 A. No.

17 Q. So then am I correct that you've also  
18 not done any online research about that issue?

19 A. That -- I said no, so any online -- no,  
20 I haven't. No.

21 Q. Some of these questions may seem  
22 repetitive, but it's just because we got to --

23 A. I understand.

24 Q. -- make sure that we understand you  
25 correctly.

1 And I believe you said that it has  
2 these three characteristics we've been discussing,  
3 is that correct?

4 A. That's correct.

5 Q. Okay. And so what I'm trying to  
6 understand is whether you have any personal  
7 knowledge based on your own experience with the P320  
8 that would make you think that the P320 is a  
9 detriment to your safety?

10 MR. WERTS: Object to form. Go ahead.

11 THE WITNESS:

12 A. To define personal knowledge, yes, it  
13 is -- it is my knowledge and it is mine, so it's  
14 personal. And I have learned it from my attorneys,  
15 so I'm not -- so is that personal knowledge?

16 I haven't had a P320 go off in my  
17 holster because I don't carry it anymore, because  
18 it's dangerous. So if that's what you mean by  
19 personal knowledge, then.

20 MS. GULLIVER:

21 Q. Well, and it's dangerous because your  
22 attorneys told you it was dangerous, correct?

23 MR. WERTS: Object to form.

24 THE WITNESS:

25 A. That's what I've been -- that's how I

1 come to understand this.

2 MS. GULLIVER:

3 Q. Okay. So have you ever been told  
4 something by someone else that didn't actually turn  
5 out to be true?

6 MR. WERTS: Object to form.

7 THE WITNESS:

8 A. Yes.

9 MS. GULLIVER:

10 Q. Okay. So then it's conceivable, right,  
11 and you understand that this is a lawsuit; this  
12 isn't proven fact yet that the information you might  
13 have gleaned from your attorneys might not actually  
14 be true?

15 MR. WERTS: Object to form.

16 THE WITNESS:

17 A. I trust my attorneys.

18 MS. GULLIVER:

19 Q. Okay. Um, and so say if a court were  
20 to ultimately rule in SIG's favor in this case,  
21 would you still believe that the P320 is a detriment  
22 to your personal safety because your attorneys told  
23 you it was?

24 MR. WERTS: Object to form.

25 THE WITNESS:

1 Q. Okay. And then I just want to also  
2 refer you to, um, the what looks like the second  
3 page.

4 There's a section called 1.0 Safety  
5 Warnings. It's the first page, I think, past the  
6 cover of it.

7 A. Are we talking about Glasscock, Joshua  
8 42?

9 Q. Correct. And do you see that safety  
10 warning section?

11 A. I see where it says safety warnings.

12 Q. And prior to today, had you ever read  
13 that page of the safety -- excuse me, of the owner's  
14 manual?

15 A. No.

16 Q. Thank you. That's it for that.

17 Did you want SIG Sauer to have told you  
18 what action type your P320 was?

19 A. I would have liked them to have told me  
20 that it was fully energized, that it had a light  
21 trigger pull, and that it did not have an external  
22 safety. I wanted to know those three things.

23 Q. So not the action type then?

24 A. I would like them to advertise as much  
25 as I can about a weapon that could be dangerous.

1 Q. Okay. So the record's clear, does that  
2 mean you did want to know the action type of your  
3 P320?

4 A. I don't want them to omit any  
5 information from me.

6 Q. And so if they had publicized -- excuse  
7 me, published this information, you would have read  
8 it?

9 A. Maybe.

10 Q. Have you -- when you've shopped for  
11 firearms before, have you ever inquired as to the --  
12 what action type the firearm is?

13 A. Not that I recall.

14 Q. In the conversations you've had with  
15 others, have you ever discussed the action type of a  
16 firearm before?

17 A. I can't recall specifics of  
18 conversations.

19 Q. Do you recall ever researching the  
20 action type of a firearm?

21 A. I can't say that I have and I can't say  
22 that I haven't. I don't --

23 Q. Actually let's just go quickly back to  
24 Exhibit 9 for a moment.

25 And let's just use like the internal

1 page numbers for the manual. So if we go to, um, I  
2 think it's page 16 of it, which should be on the  
3 Bates number last number 49.

4 And I just want to refer you to the  
5 second-to-last sentence. It says, "The P320 pistol  
6 is a striker-fired design."

7 Do you see that?

8 A. I see that verbiage.

9 Q. Were you aware that your P320 was a  
10 striker-fired pistol prior to purchasing it?

11 A. I don't -- I don't know all the  
12 definitions of stuff. I --

13 Q. Do you recall --

14 A. I knew that it was a semiautomatic  
15 pistol.

16 Q. So do you recall in your research ever  
17 hearing that it was a striker-fired pistol?

18 A. I can't recall that specific -- gaining  
19 that knowledge.

20 Q. Okay. I'm going to switch gears a  
21 little bit. Um --

22 A. Are we done with this?

23 Q. Yeah, put that to the side. Thanks.

24 So I want to talk a little bit about,  
25 um, sort of the -- the -- strike that. Um, I want



1 THE WITNESS: Don't explain it?

2 MS. GULLIVER: Yeah.

3 THE WITNESS: Okay.

4 MS. GULLIVER:

5 Q. Absolutely not. Just -- I'm just  
6 trying to understand, like he said, for example, you  
7 know, you're at a deposition.

8 So are you aware of any other things  
9 that have occurred in the case to date?

10 A. That's what I have attorneys for. I --

11 Q. So if I were to say are you aware that,  
12 um, after the motion to dismiss was filed, SIG Sauer  
13 also filed a motion for judgment on the pleadings,  
14 would you have been aware that that was filed?

15 A. Not specifically that term, but I know  
16 I've been updated on stuff about the case.

17 Q. Have you ever been sent decisions by,  
18 um, the judges in this case?

19 A. I've been given documents by my  
20 attorneys.

21 Q. Do you believe they were a decision?

22 A. They could have been. I don't know.

23 Q. Did you read those documents?

24 A. I've read what my attorneys gave me.

25 Q. Do you know whether SIG Sauer filed a

1 motion for summary judgment in this case?

2 A. I don't know specifically. I've let my  
3 attorneys handle the attorney things.

4 Q. Do you know who the judge is in this  
5 case?

6 A. Yes.

7 Q. And what is that judge's name?

8 A. I believe it's Judge Harpool.

9 Q. And was that judge the original judge  
10 in the case?

11 A. I don't think so, but I don't remember  
12 specifically how that went down, because I have  
13 attorneys to deal with all that.

14 Q. Are you aware of whether a motion for  
15 class certification was filed on your behalf?

16 A. This is a class action lawsuit.  
17 Something of that term probably was filed. I don't  
18 know if that's the correct term.

19 (Whereupon, Exhibit 10,  
20 Plaintiff's Motion for Class  
21 Certification and Suggestions in  
22 Support; 48 pages, was introduced  
23 on behalf of Ms. Gulliver for  
24 purposes of this proceeding.)

25 MS. GULLIVER:

1 part is that first page, um, which has sort of what  
2 we would call the -- the docket information for your  
3 case and then your attorneys' names.

4 And some of that is often on every  
5 document, so just to make sure I'm understanding. I  
6 want to direct you to sort of the bolded language in  
7 the middle of the first page. It says Plaintiff's  
8 Motion for Class Certification and Suggestions in  
9 Support.

10 When you said you've seen it, do you --  
11 were you specifically referring to like the pictures  
12 in here or just like a similar-looking document, if  
13 that makes sense?

14 A. Pictures, and as I scan over it, some  
15 of the discussions, it just looks like something  
16 that I've probably seen before.

17 Q. Great. Okay. Do you recall whether  
18 you provided any input, and I do not want to know  
19 what that input would be, um, to your attorneys  
20 about this motion before it was filed?

21 A. I've talked to my attorneys about the  
22 case.

23 Q. You don't recall anything specific to  
24 this document you're looking at?

25 A. I let attorneys do attorney things, and

1 I do client things.

2 Q. You can put that to the side. I'm not  
3 gonna question you on the specifics of it.

4 Do you know, um, whether your attorneys  
5 have hired any experts to act on your behalf in this  
6 case?

7 A. I've heard them discuss some experts.

8 Q. Do you know how many experts you have?

9 A. I don't specifically know how many.

10 Q. Do you know if it's more than one?

11 A. It is more than one.

12 Q. Do you know what kinds of experts you  
13 have?

14 A. I assume they're experts on firearms is  
15 how I understand it.

16 Q. Do you know what it means to be a class  
17 representative?

18 A. Yeah.

19 Q. Okay. And what does it mean to you?

20 A. In this case I represent people who own  
21 SIG P320s.

22 Q. Do you have any responsibilities as  
23 someone seeking to be a class representative?

24 A. Yes.

25 Q. And what are those responsibilities?

1           A. I represent the class. I represent  
2 those who have been put in danger by owning a P320.

3           Q. And how do you represent them?

4           A. By doing depositions.

5           Q. Is that it?

6           A. Talking to my attorneys.

7           Q. Okay. So, um, is there any other  
8 responsibility you may owe to the class besides,  
9 um, taking the deposition and talking to your  
10 attorneys?

11           MR. WERTS: Object to form. Go ahead.

12           THE WITNESS:

13           A. Sure, there is. I owe my -- I owe  
14 them -- everything I owe myself, I owe them.

15           MS. GULLIVER:

16           Q. And what do you owe yourself in that  
17 context?

18           MR. WERTS: Same objection.

19           THE WITNESS:

20           A. To represent honestly the rest of the  
21 class.

22           MS. GULLIVER:

23           Q. Other than the deposition, um, talking  
24 to your attorneys, and being honest, is there  
25 anything else that you're aware of that you're

1 responsible for as a named plaintiff?

2 MR. WERTS: Same objection.

3 THE WITNESS:

4 A. I don't -- I don't know specific  
5 terminology of all of that, but I know that I -- I  
6 have responsibilities as a class representative.

7 MS. GULLIVER:

8 Q. Right.

9 A. And by working with my attorney,  
10 attorneys, I'm fulfilling that. And by being here  
11 today, I'm fulfilling representing those people.

12 Q. Yeah, so -- so what I'm just trying to  
13 get at is -- is beyond those two items, are there  
14 other responsibilities that you're aware of?

15 A. And my answer to that is I'm sure there  
16 are.

17 Q. But you can't remember now?

18 A. I can't -- I can't go specifically  
19 through all of those things.

20 Q. So if your lawsuit is successful, do  
21 you have an understanding of what you would be  
22 entitled to in terms of damages?

23 A. Yes.

24 Q. And what do you believe you would  
25 receive?

1 second sentence, it says, "If so, please contact me  
2 as we are investigating claims that a defect in this  
3 pistol has caused a number of unintended  
4 discharges."

5 Do you see that?

6 A. Yes.

7 Q. And was this the first time that you  
8 had heard about the P320, um, potentially having  
9 unintended discharges?

10 A. I think so.

11 Q. Have you ever heard of other firearms  
12 having incidents of unintended discharges?

13 A. Not -- no. No.

14 Q. And then if we look at the last  
15 sentence in the first paragraph, it says, "We  
16 believe anyone that has purchased a P320 may have a  
17 claim against SIG Sauer, regardless of whether they  
18 have experienced an unintended discharge."

19 Do you see that?

20 A. Yeah.

21 Q. And you have not had an unintended  
22 discharge with your P320, correct?

23 A. Thank goodness, no.

24 Q. And then if we go to the next  
25 paragraph, it says, "As you may know, a version of

1 these pistols has been adopted by the US Department  
2 of Defense as the primary handgun of the US  
3 military."

4 Do you see that?

5 A. Yes.

6 Q. And it says, "However, DoD required a  
7 modification to the M17 and M18 pistols to prevent  
8 the sort of accidental discharges we are looking  
9 into."

10 Do you see that?

11 A. Yes.

12 Q. Do you have any familiarity at all  
13 with, um, applications that firearms manufacturers  
14 make, um, to become selected as a weapon for the US  
15 military?

16 A. I -- I don't know what the department  
17 of defense requires.

18 Q. Have you ever read any articles about  
19 other firearm manufacturers who have ultimately been  
20 selected to be a military firearm?

21 A. I -- I know of other weapons that the  
22 military has adopted as their main gun.

23 Q. But you haven't read any articles  
24 specifically talking about what the US Army seeks in  
25 terms of, um, features for its pistols, correct?



1           A. I haven't read any specific -- like I  
2 haven't read their list of requirements, no.

3           Q. And when you received this email on  
4 March 7th, 2022, was it the first time you had  
5 spoken to Mr. Werts since your prior representation  
6 ended?

7           A. Yes.

8           Q. And so this email indicates that it was  
9 the LearWerts' firm idea to sue SIG Sauer, correct?

10           MR. WERTS: Object to form.

11           THE WITNESS:

12           A. I'm the class representative. They're  
13 acting on my behalf to sue SIG Sauer.

14           MS. GULLIVER:

15           Q. Right. But you weren't their client at  
16 the time of this email, correct?

17           MR. WERTS: Object to form.

18           THE WITNESS:

19           A. I own a SIG P320, so I'm the injured  
20 party.

21           MS. GULLIVER:

22           Q. Right. What I'm asking you is  
23 different, which is -- because it wasn't you that  
24 wrote the LearWerts firm and said, "I would like to  
25 sue because I'm concerned about unintended

1 discharges," correct?

2 A. I'm glad they emailed me about these  
3 dangers. But no, I didn't seek them out, if that's  
4 what you're asking.

5 Q. That is what I'm asking.

6 A. Okay.

7 Q. Thank you. I think you mentioned you  
8 still have your P320, correct?

9 A. Correct.

10 Q. Okay. Um, where is it kept?

11 A. In a safe, unloaded.

12 Q. Do you know whether anyone has  
13 inspected it?

14 A. Yes.

15 Q. And who has inspected it?

16 A. I don't recall his name.

17 Q. Was it someone for SIG Sauer?

18 A. It was for this case. I know that -- I  
19 believe he was a firearms expert inspected it.

20 Q. Okay. So after you wrote back and let  
21 Mr. Werts know that you owned a P320, um, did you  
22 receive some further communication?

23 I don't want to know what it was  
24 saying, so I'm just asking, did they then reach out  
25 to you?

1 price of a gun. I don't --

2 Q. But you've purchased multiple firearms  
3 yourself, right?

4 A. Yeah.

5 Q. So what do you look at to set the price  
6 of a used firearm?

7 A. Its condition. Its popularity.  
8 Comparable prices of the same weapon.

9 Q. So we've talked about -- I'm going to  
10 shorthand this, and I apologize, but sort of the  
11 three, um, things you wanted to be told about the  
12 P320.

13 If you had been told those things prior  
14 to purchase, would you have been willing to purchase  
15 it but just for a lower price?

16 A. No.

17 Q. And I think you testified earlier that,  
18 um, you became aware that there were lawsuits that  
19 were filed in relation to the P320 but you didn't  
20 know about them prior to purchase, correct?

21 A. I mean I had -- I had read articles,  
22 I'm sure, before that about all the -- of it going  
23 off in the holster. I'm sure -- I'm sure I had seen  
24 news articles about that. There had been numerous  
25 cases of it.

1 MS. GULLIVER:

2 Q. What is your understanding of the claim  
3 you're bringing?

4 A. That the way that this was marketed was  
5 deceiving to purchasers. They omitted information,  
6 dangerous information that consumers should have  
7 known about. That is the gist of it.

8 Q. So if a consumer did know that  
9 information, do you think they were injured?

10 MR. WERTS: Object to form.

11 THE WITNESS:

12 A. Yes, because they're walking around  
13 with a dangerous gun. That is --

14 MS. GULLIVER:

15 Q. If, um -- were you aware that, um, you  
16 can get a P320 retrofitted with a manual safety?

17 A. What do you mean, retro -- retrofitted?

18 Q. Are you aware that you could go to  
19 someone and ask that a manual safety be added to  
20 your existing P320?

21 A. I'm not -- I don't think I'm aware of  
22 that.

23 Q. If someone were to take your P320, add  
24 a manual safety to it, do you -- would that remedy  
25 the defect in your mind?

1           A. No, because there's two other factors  
2 to it that together make it dangerous. It's -- it's  
3 ready to fire, it has a short trigger pull, and it  
4 has no manual safety.

5           Q. So --

6           A. And it goes off in people's holsters.

7           Q. So if there was another firearm out  
8 there that has an external safety feature but also  
9 still has a short trigger pull and is fully  
10 energized, you feel that that firearm is also  
11 defective?

12           MR. WERTS: Object to form.

13           THE WITNESS:

14           A. I'd have to look at the totality of the  
15 weapon, I guess.

16           MS. GULLIVER:

17           Q. So if you, um -- so if you do not think  
18 that, um, adding a manual safety fixes the -- the  
19 defect, what are you hoping to get out of the case?

20           MR. WERTS: Object to form.

21           THE WITNESS:

22           A. Fixing the manual safety is a factor to  
23 this. But there -- I want the other factors  
24 addressed as well.

25           I want people who own P320s, including

1           A. I think this was a working document  
2 that we discussed in depth.

3           Q. So it's possible that you may have made  
4 some changes?

5           A. It's possible. I mean we discussed  
6 this.

7           Q. Like I said, I don't want to -- don't  
8 want to get into what those might be.

9           I just want to refer you to paragraph  
10 24, which should be on page 5.

11           And do you see the first sentence says,  
12 "In its marketing about the military's adoption of  
13 the P320, though, SIG Sauer never discloses the  
14 military version of the pistol contains an  
15 ambidextrous safety."

16           Do you see that?

17           A. Yes.

18           Q. Do you have an understanding of what  
19 the factual basis is for that statement?

20           MR. WERTS: Object to form.

21           THE WITNESS:

22           A. That the gun that was marketed to me  
23 was different than the gun marketed to military.  
24 That it was -- that I was deceived whenever I  
25 purchased the gun, that I thought that the P320 that

1 I had was the same one that the military had.

2 MS. GULLIVER:

3 Q. So -- so you think this paragraph is  
4 referring to you specifically and not the marketing  
5 about the military's adoption of the P320?

6 A. I was --

7 MR. WERTS: Object to form.

8 THE WITNESS:

9 A. I was a consumer of the marketing, and  
10 so was everyone else in some way, shape, or form of  
11 the P320.

12 MS. GULLIVER: Okay. Um, let's put  
13 that aside just for a moment and then let's look at  
14 (indistinct).

15 (Whereupon, Exhibit 14, SIG Sauer  
16 Press Release, "SIG SAUER Brings  
17 the U.S. Army's M17 to the  
18 Commercial Market; SIG-GLASSCOCK  
19 00006703-6704; 2 pages, was  
20 introduced on behalf of Ms.  
21 Gulliver for purposes of this  
22 proceeding.)

23 MS. GULLIVER:

24 Q. Now I'm going to show you what has been  
25 marked as Exhibit 14.

1 MR. WERTS: Oh, thank you.

2 MR. MANN: Thank you.

3 MS. GULLIVER:

4 Q. I'm just gonna ask you, have you ever  
5 seen this document before?

6 A. No.

7 Q. And just for the record, it is marked  
8 as SIG-Glasscock 00006703.

9 And do you see at the top it says, "For  
10 immediate release" and then it says, "SIG Sauer  
11 brings the US Army's M17 to the commercial market"?

12 A. Yes, I see that.

13 Q. And then do you see after it describes  
14 sort of the date and location, it says, "SIG Sauer  
15 Inc is pleased to introduce the commercial variant  
16 of the US Army's M17 official service pistol called  
17 the P320-M17."

18 Do you see that?

19 A. Yes.

20 Q. Okay. And do you see how the -- this  
21 document is dated July 18th, 2018?

22 A. That's what it says.

23 Q. And then if you go to the fourth  
24 paragraph down, the last sentence in that paragraph,  
25 do you see it says, "Nonmanual safety P320-M17



1 pistols will be shipped at a later date."

2 Do you see that?

3 A. I see that.

4 Q. So SIG Sauer did disclose publicly that  
5 the commercial variant of its P320 that -- that was  
6 the same as the US Army's was the M17, correct?

7 MR. WERTS: Object to form.

8 THE WITNESS:

9 A. That's what you're saying. I haven't  
10 seen this document.

11 MS. GULLIVER:

12 Q. Right. If you want to refer back,  
13 though, to your complaint, the complaint in  
14 paragraph 24 states, "In its marketing about the  
15 military's adoption of the P320, though, SIG Sauer  
16 never discloses the military version of the pistol  
17 contains an ambidextrous manual safety."

18 Do you see that?

19 A. Are we talking about 24 here?

20 Q. Yes.

21 A. Okay.

22 Q. So what I'm asking is that SIG Sauer  
23 did disclose publicly, though, that its P320 that  
24 matched the US Army was the M17 and that the M17  
25 came with a manual safety?

1 MR. WERTS: Objection to form.

2 THE WITNESS:

3 A. I did not know that.

4 MS. GULLIVER:

5 Q. Is it possible that other people did  
6 because they looked at different marketing than you?

7 MR. WERTS: Objection, form.

8 THE WITNESS:

9 A. A lot of things that are possible, but  
10 I saw pictures and military -- military using the  
11 P320.

12 MS. GULLIVER:

13 Q. But it would not be true to say that  
14 SIG Sauer never told people publicly that the M17  
15 had a manual safety?

16 MR. WERTS: Objection, form,  
17 foundation. Go ahead.

18 THE WITNESS:

19 A. I was never told.

20 MS. GULLIVER:

21 Q. Right. But that's not the question I'm  
22 asking.

23 I'm saying, did SIG Sauer publicly tell  
24 people that the M17 was its version of the US Army,  
25 um, pistol and that it came with a manual safety?

1 MR. WERTS: Objection, form,  
2 foundation.

3 THE WITNESS:

4 A. I have never seen this document.  
5 You're -- you're telling me that they did. I was  
6 never told. That information was not told to me.

7 MS. GULLIVER:

8 Q. So do you have any basis to support the  
9 statement that in its marketing about the military's  
10 adoption of the P320, though, SIG Sauer never  
11 discloses that the military version of the pistol  
12 contains an ambidextrous manual safety?

13 MR. WERTS: Objection, form.

14 THE WITNESS:

15 A. Like I told you earlier, people in  
16 military fatigues and advertisements that it's good  
17 enough for the military.

18 But I -- it did not in my understanding  
19 of looking at that advertisement, that it -- I  
20 believed that the gun that I purchased was the same  
21 one that the military had. That is what I believed.

22 MS. GULLIVER:

23 Q. Right. But paragraph 24 doesn't say,  
24 "Mr. Glasscock never saw any advertising about the  
25 M17," right?

1 A. No, it doesn't mention my name.

2 Q. Right. It's talking more broadly about  
3 SIG Sauer's marketing regarding the P320, correct?

4 A. Yeah.

5 MR. WERTS: Are we finished with 14 or  
6 are we --

7 MS. GULLIVER: The press release, yes.

8 MR. WERTS: Okay.

9 (Whereupon, Exhibit 15, Marketing  
10 Materials for SIG Sauer P320;  
11 SIG-MARKETING-000107-111; 5 pages,  
12 was introduced on behalf of Ms.  
13 Gulliver for purposes of this  
14 proceeding.)

15 MS. GULLIVER:

16 Q. I'm now gonna show you what's been  
17 marked as Exhibit 15.

18 MR. WERTS: Thank you.

19 MR. MANN: Thank you.

20 MS. GULLIVER:

21 Q. And for the record, it's been marked as  
22 SIG-MARKETING-000107 to 111.

23 Have you ever seen this document  
24 before?

25 A. Are we just talking about 107? Or are

1 we talking about the whole --

2 Q. Flip through any of the pages and see  
3 if anything looks familiar to you.

4 A. Not particularly. I've seen -- like I  
5 said, there's a military guy looks like holding the  
6 P320. It says SIG Sauer. I've seen stuff like  
7 that. I've seen pictures of P320s.

8 Q. So I just want to direct you  
9 specifically to the page ending 109. It's the  
10 second-to-last or third-to-last page.

11 Do you see that?

12 And apologies again for the tiny  
13 writing. But do you see on the page on the  
14 left-hand side?

15 A. Yeah.

16 Q. And do you see there's a US Army logo  
17 there?

18 A. Yes.

19 Q. And it says, "Based on the M17 firearm  
20 selected by the US Army."

21 Do you see that?

22 A. That kind of looks like that's what  
23 that says.

24 Q. And then if you look immediately to the  
25 right of the picture of the firearm, it says,

1 "Available with manual safety"?

2 A. That's what that looks like that says.

3 Q. And then does it appear that the  
4 picture of the pistol has a manual safety?

5 A. Yes.

6 Q. You can put that aside now, please.

7 Let's just go back to Exhibit 13. I  
8 just want to refer you to paragraph 7 of your  
9 complaint.

10 And that paragraph says, "Joshua  
11 Glasscock is a resident of Polk County, Missouri.  
12 He is a longtime law enforcement officer. He  
13 purchased his SIG Sauer P320 in April 2020 in Polk  
14 County, Missouri. He paid approximately \$400 for  
15 the pistol. The pistol's serial number is 58A as in  
16 apple 146892."

17 Do you see that?

18 A. Yes, number 6.

19 MR. WERTS: Yeah, it was number 6, not  
20 number 7.

21 MS. GULLIVER: Oh.

22 MR. WERTS: That's a minor point, but.

23 MS. GULLIVER: No, but thank you for  
24 that.

25 Q. So it's in paragraph 6. Do you see

1 that?

2 A. Yes.

3 Q. And does that look like an accurate  
4 description of your purchase of the P320?

5 A. Yes.

6 Q. This paragraph doesn't mention, though,  
7 that you purchased your pistol from a friend,  
8 correct?

9 A. The paragraph doesn't mention that, no.

10 Q. And this paragraph also doesn't mention  
11 that you purchased your -- the P320 you purchased  
12 was used, correct?

13 A. No, it doesn't mention that.

14 Q. I want to refer you to paragraph 30 of  
15 the complaint. Actually maybe I have that wrong.  
16 Hang on a second.

17 I guess let's start at 29 -- or 28,  
18 just to show some context. But why don't you take a  
19 look at paragraphs 28, 29, and 30. Just let me know  
20 when you've read them.

21 A. Okay.

22 Q. Um, so do you see how it references a  
23 P320 operator's manual?

24 A. In paragraph 28?

25 Q. Yes.

1 A. Correct, I've never read it.

2 MS. GULLIVER:

3 Q. So any statement that's contained in  
4 the owner's manual wouldn't have had an impact on  
5 your purchase, right?

6 MR. WERTS: Object to form.

7 THE WITNESS:

8 A. Not necessarily.

9 MS. GULLIVER:

10 Q. Well, how would it have?

11 A. I don't know.

12 Q. And I believe you said you testified  
13 that you had never read the Taurus owner's manual  
14 either, correct?

15 A. Correct.

16 Q. What about your Glock 23, did you ever  
17 read that owner's manual?

18 A. No.

19 Q. What about your Glock 19 that you've  
20 been issued now, have you read that owner's manual?

21 A. No, not the whole thing.

22 Q. You said not the whole thing. Is there  
23 a part of it you've read?

24 A. I mean whenever we go through it at the  
25 academy, I mean we looked at the, uh, the picture of



1 it and the labeling and all that.

2 Q. Okay. So as part of your training, you  
3 were shown portions of the operator's manual?

4 A. Yes, the picture portion of it, yes.

5 Q. I'm going to refer you to paragraph 61  
6 of your complaint, so that's page 11 in your  
7 complaint.

8 And right above paragraph 61, do you  
9 see it says sort of in bold and italics, "SIG  
10 Sauer's omissions"? Do you see that?

11 A. Yes.

12 Q. And it says, "In summation, SIG Sauer  
13 omits, conceals, and/or fails to disclose several  
14 material facts about the P320 firearm."

15 Do you see that?

16 A. Yes.

17 Q. Okay. "It has a heightened risk of  
18 inadvertent discharges due to the absence of  
19 external safety features, even under normal and/or  
20 foreseeable handling circumstances."

21 Do you see that?

22 A. Yes.

23 Q. And do you believe that to be true?

24 A. Yes.

25 Q. And then you'll see Part B, it says,

1 "It requires a heightened degree of care than  
2 comparable firearms due to its lack of external  
3 safety features."

4 Do you see that?

5 A. Yes.

6 Q. And do you believe that to be a correct  
7 statement?

8 A. Considering I don't handle it anymore,  
9 yes.

10 Q. And then if you go to the next page,  
11 then there's cate- -- number C -- or letter C,  
12 excuse me. Um, it says, "It lacks safety features  
13 available on other comparable firearms in the  
14 marketplace."

15 Do you see that?

16 A. Yes.

17 Q. And, um, are those -- and then it  
18 says -- apologies; strike that.

19 And then let's go to paragraph 63. It  
20 says, "Plaintiff was not aware of these omissions at  
21 the time of purchase," correct?

22 A. Correct.

23 Q. And then it says in paragraph 64, "Had  
24 plaintiff known of these omissions, he would not  
25 have purchased the P320 firearm or he would have

1 paid substantially less for it," correct?

2 A. Correct.

3 Q. Okay. Um, I believe you testified  
4 earlier that you would not have paid substantially  
5 less for it. You just would not have purchased it,  
6 correct?

7 A. Correct.

8 Q. Do you believe that these are the  
9 omissions that you are suing about?

10 MR. WERTS: Object to form.

11 THE WITNESS:

12 A. Yes.

13 MS. GULLIVER:

14 Q. Why didn't you mention in paragraph 61  
15 that SIG Sauer hadn't told you that you had -- it  
16 had a short and light trigger pull?

17 MR. WERTS: Object to form.

18 THE WITNESS:

19 A. I don't know. It says heightened risk,  
20 I mean I think it could be covered in the verbiage  
21 of it.

22 MS. GULLIVER:

23 Q. Well, it says a heightened risk because  
24 of -- due to, excuse me, absence of external safety  
25 features, right?

1 It doesn't say heightened risk because  
2 it has a short and crisp trigger pull, right?

3 MR. WERTS: Object to form. Go ahead.

4 THE WITNESS:

5 A. Okay.

6 MS. GULLIVER:

7 Q. Does that mean you agree with me?

8 MR. WERTS: Object to form.

9 THE WITNESS:

10 A. I see what you're saying, yes.

11 MS. GULLIVER:

12 Q. Okay. Similarly, why didn't you  
13 reference in here that, um, the P320 was highly  
14 energized?

15 MR. WERTS: Object to form.

16 THE WITNESS:

17 A. I don't know.

18 MS. GULLIVER: Can we take like two  
19 minutes to go off the record and see if we have  
20 anything else?

21 MR. WERTS: Sure.

22 THE WITNESS: Yeah.

23 THE VIDEOGRAPHER: Off the record,  
24 1:49.

25 (Whereupon, proceedings go off

\* \* \* \* \*

## REDIRECT EXAMINATION

BY MS. GULLIVER:

Q. Mr. Glasscock, do you carry your Glock 19 currently when you carry it loaded?

A. Yes.

Q. And does your employer want you to carry it loaded?

A. Yes.

MS. GULLIVER: Thank you. No more questions for me.

MR. WERTS: Let's call it a day. We'll read and sign.

THE COURT REPORTER: And could I get your orders for the record?

MR. WERTS: Electronic only. No video at this time.

THE COURT REPORTER: And when do you need it?

MR. WERTS: That's up to her.

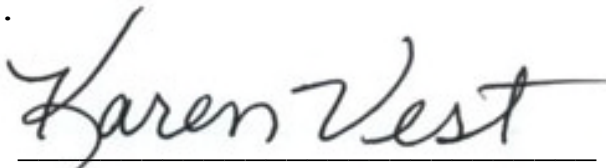
MS. GULLIVER: Yeah. Um, we are gonna need it quickly because we have a motion coming.

THE COURT REPORTER: I have an order for tomorrow delivery.

MS. GULLIVER: Oh, okay. Well, there

## CERTIFICATE OF REPORTER

I, Karen Vest, Registered Professional Reporter, Certified Realtime Reporter, and Certified Court Reporter within and for the State of Missouri, do hereby certify that the witness whose testimony appears in the foregoing transcript was duly sworn by me; that the testimony of said witness was preserved via stenotype by me to the best of my ability and was thereafter reduced to written form under my direction; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further that I am not a relative or employee of any attorney or counsel employed by the parties thereto, nor financially or otherwise interested in the outcome of the action.



Karen Vest, RPR, CRR,  
Missouri CCR No. 846